

OCT 27 1993

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Policies and Rules Implementing	)	CC Docket No. 93-22
the Telephone Disclosure and	)	RM-7990
Dispute Resolution Act	)	

COMMENTS OF THE  
NATIONAL TELEPHONE COOPERATIVE ASSOCIATION  
IN SUPPORT OF AT&T'S PETITION FOR LIMITED WAIVER

The National Telephone Cooperative Association ("NTCA"), pursuant to Section 1.3 of the Commission's Rules, submits these Comments in support of the Petition for Limited Waiver on an Expedited Basis filed by AT&T with the Commission on October 20, 1993 ("AT&T Petition"). The AT&T Petition contains a request to delay, for an eight month period, application of certain requirements imposed by Sections 64.1509(b)(2), 65.1510(a)(2)(i), (ii), and 64.1510(b) of the Commission's Rules.<sup>1</sup> NTCA is a national association of approximately 500 small and rural local exchange carriers ("LECs") providing telecommunications services to interexchange carriers ("IXCs") and subscribers throughout rural America. Most NTCA member LECs provide billing and collection services to AT&T and are indirectly affected by the rules in question and the resolution of the AT&T Petition.

NTCA urges the Commission to grant the AT&T Petition. As explained in its petition, AT&T relies on many LECs to perform, via contract, billing and collection for AT&T's services and its 900 pay-per-call customers. AT&T, to fulfill the requirements

<sup>1</sup> AT&T Petition at 1.

under the 900 pay-per-call rules, must seek changes in the billing and collection arrangements with LECs as well as changes in its own billing systems.<sup>2</sup>

NTCA members fall within one of three categories regarding billing and collection arrangements associated with AT&T 900 calls: 1) those that maintain in-house billing and collection systems and software; 2) those that utilize commercially available billing and collection software from vendors; and 3) those that utilize third party service bureaus for billing and collection functions. AT&T contracts with NTCA members either directly or through a billing and collection clearinghouse to perform billing and collection functions for long distance calls including 900 pay-per-calls. The amount of work required to change these systems differs from one to the next depending on a number of factors. Some LECs and software developers maintain systems which make it relatively easy to make modifications and may be ready to accommodate the necessary changes by November 1. However, completion of AT&T's billing changes to implement the 900 requirements in other cases is a complex process involving tedious changes in programming software and systems and can involve multiple staffs both inside and outside the LEC's operations. Therefore, some of NTCA's member LECs, together with their third party billing and software vendors, will find it extremely difficult to meet AT&T's billing requests by the November 1, 1993, deadline for certain aspects of 900 pay-per-

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<sup>2</sup> AT&T Petition at 3-5.

call billing requirements. NTCA agrees with AT&T that for these LECs "these modifications require massive systems changes that cannot be implemented by the rules' effective dates."<sup>3</sup>

NTCA members report diligent efforts are being made to perform the extensive programming changes required to fulfill AT&T's billing requirements for pay-per-call services. NTCA members are generally able to ensure compliance with Section 64.1509(b)(2) concerning disclosure statements, but not the remaining sections, by November 1, 1993. NTCA agrees with AT&T that LECs "cannot fully comply with the Commission's regulations due to substantial technical burdens."<sup>4</sup>

For the above stated reasons, NTCA respectfully asks the Commission to grant the AT&T Petition. The extension of time will allow NTCA members to complete fully the billing changes needed by AT&T.

Respectfully submitted,

NATIONAL TELEPHONE COOPERATIVE  
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October 27, 1993

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<sup>3</sup> AT&T Petition at 4.

<sup>4</sup> Petition at 5.

CERTIFICATE OF SERVICE

I, Rita H. Bolden, certify that a copy of the foregoing  
Comments of the National Telephone Cooperative Association, In  
Support of AT&T's Petition for Limited Waiver in CC Docket  
No. 93-22/RM-7990 was served on this 27th day of October 1993, by  
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